

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Gilmanton School District

Administrative Review Conducted on: 3/31/2017

Sites Selected for Review: Gilmanton Middle School

Date Corrective Action Plan was provided to SFA: 4/21/2017

Due Date for Corrective Action Plan: 5/19/2017

Commendations & Suggestions
Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for the breakfast menu.
The SFA's financial documents submitted as part of the resource management review were well organized, easy to review, and demonstrate a strong financial management system.
Thank you for being so organized for the review. All the documentation was in order and easy to review.
You did a great job tracking the professional standards hour for all the nutrition staff and non-nutrition staff involved with the program.
Thank you for your kind accommodations during the review.

Other areas of Technical Assistance (NOT requiring Corrective Action)
Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
The SFA was informed that a plate count is not an accurate way to double check meal counts.
Resource Management - The food service program operated at a loss and required a general fund transfer, which is considered a risk factor. The general fund properly supports the food service program when food service cash resources are unavailable, and the SFA reports a general fund transfer on the Child Nutrition Program Report. Operating at a loss is allowed, although the SFA should reassess the financial management of the program to see if improvements could be made to help reduce or eliminate the deficit.

Profession Standards - Technical assistance provided regarding the employee count for professional standards. It was determined that the manager is to complete the hours of training for the director. She has completed 30 hours. Further, it was determined that there is one full-time employee, two subs that were hired after January 1st, and 11 non-nutrition staff with responsibilities related to the program. The full-time staff and non-nutrition staff have received the required training hours. The substitutes, hired after January 1 have completed half the required training hours and there are plans to complete the remaining 2 hours prior to the end of the school year.

Wellness Policy - technical assistance provided regarding posting the assessment of the wellness policy once it has been approved by the school board.

Professional Standards - technical assistance provided that the person designated as the manager is actually the director and should complete the director hours each year. This year the director has completed many more hours than are required.

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding

A summary of the regulation / requirement

The Code of Federal Regulations citation number or alternate resource citation

Suggested guidance for the SFA in order to achieve compliance

SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Finding #1
410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: minimum of 8 oz. equivalent of grains per week.

SFA Suggested Guidance for Compliance
<p>To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.</p>
SFA Response

Finding #2
<p>Resource Management – NonProgram Food Revenue Prior to the review, the SFA had not determined compliance with nonprogram food requirements.</p>
Technical Assistance Provided
<p>The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year. During the review, the SFA completed the DPI tool as requested, and it showed the SFA was in compliance. A copy of the tool was sent to the SFA, and can also be found on the DPI website.</p>
Regulation / Citation and Summary
<p>7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.</p> <p>(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.</p> <p>(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.</p>
SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance.

SFA Response

Finding #3

The SFAs Local School Wellness Policy has not been reviewed or updated.

Technical Assistance Provided

During the on-site review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices.

Regulation / Citation and Summary

210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that the wellness policy will be reviewed and updated by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to determine the needed updates. If the policy has been updated by the corrective action due date, submit a copy of the revised wellness policy. If the due date is prior to the completion of the updates, submit a detailed timeline for the implementation of the changes. Once the revisions have been made a copy of the wellness policy should be submitted to the state agency for review.

SFA Response

Finding #4
The SFA has not performed SFSP outreach.
Technical Assistance Provided
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.
Regulation / Citation and Summary
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.
SFA Suggested Guidance for Compliance
To come into compliance with this requirement, the SFA must submit written assurance that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.
SFA Response

Finding #5
The site had products in storage that violated the Buy American provision and no documentation was available to show domestic alternatives were considered. Additionally, the SFA was not sure if the Buy American clause is part of the product specification language.
Technical Assistance Provided
<p>The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.</p> <p>More information on this new requirement can be found on the SNT website at http://dpi.wi.gov/school-nutrition/procurement/buy-american including a tool to assist with tracking noncompliance products.</p>
Regulation / Citation and Summary

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
SFA Suggested Guidance for Compliance
To come into compliance with the Buy American requirement the SFA must provide a statement that they will ensure language is included in procurement documentation, ensure they are aware of and utilizing the procurement manual and, if appropriate, will use the tracking template to use to communicate with distributors.
SFA Response